

**Karen Warren**

---

**From:** Christopher Madiou <chris@madioulaw.com>  
**Sent:** Wednesday, September 4, 2024 11:05 AM  
**To:** Karen Warren  
**Cc:** Budlow, Paul (USAMD)  
**Subject:** Re: Status Report in U.S. v. Stavrakis, ELH-19-160

Approved -  
Next Status  
report due  
by 9/20/24.

ELH  
USDJ  
9/4/24

**CAUTION - EXTERNAL:**

Dear Judge Hollander,

The parties submit this update on Mr. Stavrakis' motion for compassionate release. Since our last update, the government has provided counsel with the additional records the defense expert requested, which we referenced in our last update to the Court. Those records were produced by the government and delivered by undersigned counsel to our defense expert. As of this writing, counsel is still waiting on our defense expert to review the additional materials provided by the government. Once this review is complete, our expert anticipates that he will be in a position to draft a declaration. At that point, counsel will begin to draft the supplemental motion on behalf of the defense with the full benefit of his most up-to-date records and with the medical opinion of our defense expert.

The parties continue to work diligently and cooperatively and government counsel has provided all the records that counsel has requested in a timely manner. The parties respectfully ask that an additional status letter be filed on or before September 20, 2024.

Respectfully submitted,

Chris Madiou  
Counsel for Demetrios Stavrakis.